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7 WAL-MART STORES, INC.

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
10

11 STEFANY HAZELETT,

12 Plaintiff,

13 vs.

14 WAL-MART STORES, INC., a Delaware  
Corporation ,

15 Defendant.  
16

Case No. 3:17-cv-00274-MMD-CBC

**[PROPOSED] STIPULATION AND ORDER  
TO EXTEND DISPOSITIVE MOTION  
DEADLINE**

**(FOURTH REQUEST)**

17 Pursuant to LR IA 6-1, 6-2, and LR 26-4, Plaintiff, STEFANY HAZELETT and Defendant,  
18 WAL-MART STORES, INC., by and through their respective counsel of record, stipulate and agree  
19 to a 30-day extension of the dispositive motions deadlines pending participation in a settlement  
20 conference. In support of this Stipulation the parties submit that the deadline to submit dispositive  
21 motions in this matter is currently January 9, 2019 (ECF No. 51). The new deadline would therefore  
22 be **February 8, 2019**.

23 The parties worked diligently to schedule a mediation and have since agreed instead to seek a  
24 judicial settlement conference. On August 23, 2018, the parties filed a Stipulation and Order to  
25 Schedule a Settlement Conference Pursuant to LR II 16-5 (ECF No. 47). On September 24, 2018,  
26 the parties' stipulation was signed by District Judge Miranda M. Du and the parties' settlement  
27 conference assigned to Magistrate Judge Robert A. McQuaid, Jr., in Las Vegas. (ECF No. 50.) The  
28

parties' counsel thereafter sought dates from Magistrate Judge McQuaid's chambers. Based on Magistrate Judge McQuaid's, the parties' availability, and their respective counsel's availability, a settlement conference was set on January 8, 2019 at 9:45 a.m. (ECF No. 52.) However, the parties' dispositive motion deadline is January 9, 2019, one day later. As such, the parties seek a 30-day extension to preserve attorneys' fees and costs in the pursuit of settlement of this case.

This is the fourth request for an extension to the dispositive motion filing deadline. The requested extension is sought in good faith and not for purposes of undue delay. The request to extend the dispositive motion deadline is subject to the good cause standard as the request is filed more than 21 days prior to its expiration and in order to preserve the parties' resources pending participation in a settlement conference pending a setting from the Court.

Dated: November 20, 2018

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Respectfully submitted,

Respectfully submitted,

/s/ James P. Kemp, Esq.  
JAMES P. KEMP, ESQ.  
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/s/ Z. Kathryn Branson, Esq.  
ROGER L. GRANDGENETT II, ESQ.  
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Attorney for Plaintiff  
STEFANY HAZELETT

Attorneys for Defendant  
WAL-MART STORES, INC.

IT IS SO ORDERED.

Dated: November 27, 2018.

*No further extensions will be granted of the dispositive motion deadlines in this matter.*

  
UNITED STATES MAGISTRATE JUDGE